

June 24, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20544

Re: In the Matter of The Pay Telephone Reclassification and Compensation
Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

Lackawaxen Telecommunications Services, Inc. ("LTS") submits this letter and accompanying certification as record that LTS is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")¹, released on October 3, 2003, respecting the obligations of Completing Carriers to provide certain compensation and reporting to payphone service providers (PSPs), replacing the Commission's interim compensation rules effective July 1, 2004.

As LTS is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to PSPs, LTS is not subject to such requirements at this time. If LTS's operations are altered to the extent that LTS necessarily becomes a Completing Carrier, LTS intends to fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,

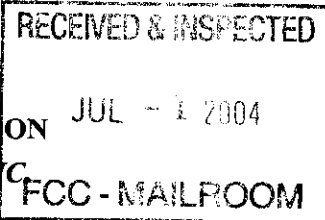
Gilbert Depew
Operations Manager
Lackawaxen Telecommunications Services, Inc.

cc: Ms. Ruth Jaeger
President
APCC Services, Inc.
625 Slater Lane, Suite 104
Alexandria, Virginia 22314

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¹ *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).*

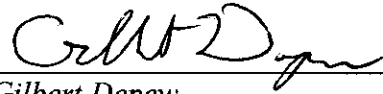
**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF LACKAWAXEN TELECOMMUNICATIONS SERVICES, INC.**



1. My name is *Gilbert Depew*. I currently serve as the *Operations Manager* of *Lackawaxen Telecommunications Services, Inc.* (LTS), a provider of local exchange telecommunications services as an Independent Local Exchange Carrier in the state of *Pennsylvania*. In this capacity, I have become familiar with the network operations of *LTS* and its practices associated with the completion of calls originated from Pay Telephones.
2. LTS is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. LTS's provision of operator services for the completion of local calls from pay telephones is handled by AT&T through a contractual arrangement.
4. To the best of our knowledge any calls processed by AT&T are included in the respective call tracking systems and compensation remittance process of AT&T.
5. LTS does not currently provide a coinless access code service.
6. With respect to subscriber toll-free payphone calls, LTS contracts with ANPI for completion subscriber toll-free calls.
7. LTS's does not create call detail records for either access code calls or subscriber toll-free payphone calls. LTS's action with respect to call detail records is limited to rating and billing.
8. LTS compensates AT&T and/or ANPI for the wholesale cost of the call.
9. To the best of our knowledge any calls purchased by LTS are included in the respective call tracking systems and compensation remittance process of AT&T and ANPI.
10. In consideration of the aforementioned facts, LTS is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

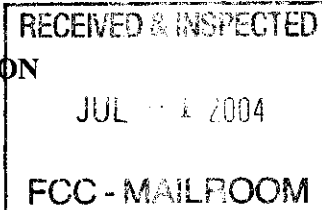
I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on *June 24, 2004*.

¹ *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).*

A handwritten signature in cursive script, appearing to read "Gilbert Depew", positioned above a horizontal line.

Gilbert Depew
Operations Manager
Lackawaxen Telecommunications Services, Inc.
PO Box 8
Rowland, PA 18457

**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF LACKAWAXEN LONG DISTANCE**

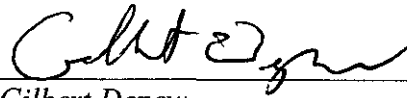


1. My name is *Gilbert Depew*. I currently serve as the *Operations Manager* of *Lackawaxen Long Distance*. (LLD), a provider of interstate interexchange telecommunications services as a toll reseller in the state of *Pennsylvania*. In this capacity, I have become familiar with the network operations of *LLD* and its practices associated with the completion of calls originated from Pay Telephones.
2. LLD is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. With respect to coinless access code calls, LLD is a switchless reseller. LLD contracts with the underlying carrier for completion of calls originated by access code.
4. With respect to subscriber toll-free payphone calls, LLD is a switchless reseller. LLD contracts with the underlying carrier for completion subscriber toll-free calls.
5. LLD does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
6. LLD's does not create call detail records for either access code calls or subscriber toll-free payphone calls. LLD's action with respect to call detail records is limited to rating and billing.
7. LLD compensates underlying carrier for the wholesale cost of the call.
8. To the best of my knowledge any calls purchased by LLD are included in the respective call tracking systems and compensation remittance process of the underlying carrier.
9. In consideration of the aforementioned facts, LLD is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

*NOTE: The underlying carriers for LLD are as follows: TOLY, Conestoga, and ANPI

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 24, 2004.

¹ *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996*, CC Docket No. 96-128, Report and Order, (2003) (Order).



Gilbert Depew
Operations Manager
Lackawaxen Long Distance
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